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SUBJECT: Provides status of util schedule for completing actions to address NRC identified issues re GL 89-10 program closure for Units 2 & 3.

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 TITLE: Response to Generic Ltr 89-10, "Safety-Related MOV Testing & Surveillance"

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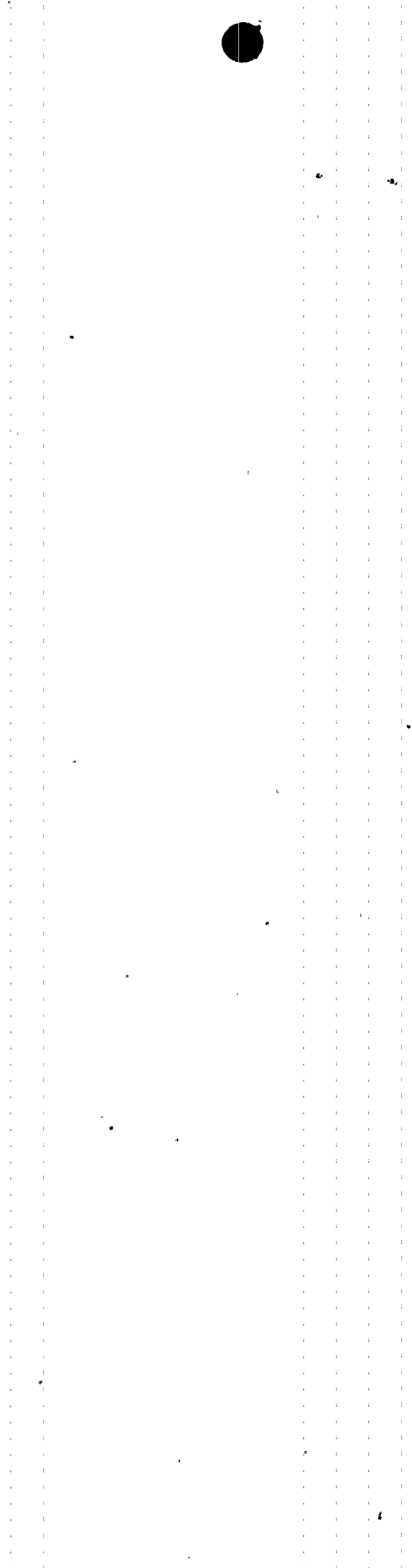
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Tennessee Valley Authority, Post Office Box 2000, Decatur, Alabama 35609-2000

March 16, 1998

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Gentlemen:

In the Matter of) Docket No. 50-260
Tennessee Valley Authority) 50-296

BROWNS FERRY NUCLEAR PLANT (BFN) - UNITS 2 AND 3 - GENERIC
LETTER (GL) 89-10, SAFETY-RELATED MOTOR-OPERATED VALVE TESTING
AND SURVEILLANCE, STATUS OF ACTIONS FOR PROGRAM CLOSURE (TAC
NOS. M75636 AND M75637)

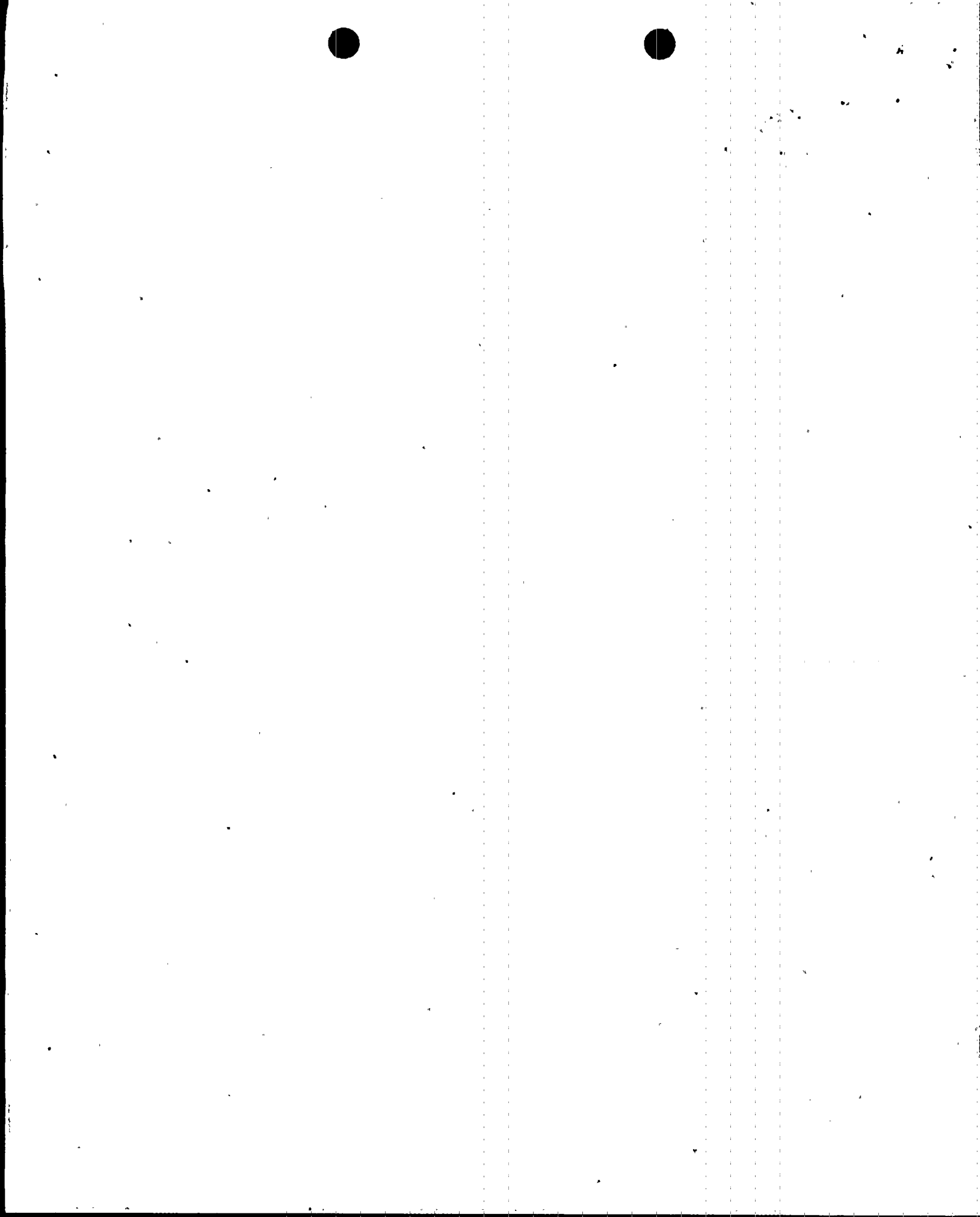
This letter provides a status of TVA's schedule for completing
actions to address NRC identified issues regarding the GL 89-10
program closure for BFN Units 2 and 3.

On November 17 through November 21, 1997, NRC conducted an
inspection (Inspection Report 97-11) of BFN's Unit 3 GL 89-10
program. Several issues were identified and characterized by
the inspectors as requiring resolution prior to program closure
by NRC. The primary issue identified involves design
assumptions for valve factors made when the BFN GL 89-10
program was established. These assumptions relate to the
effective friction factor under loaded conditions, i.e., when
the MOV operates with a differential pressure (DP).

By letter dated December 15, 1997, TVA committed to take
actions to resolve the issues identified by NRC. TVA also
committed to provide a status of its progress in completing
the actions described in the letter. Listed below are the
commitments made by TVA and their status.

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TVA COMMITMENT

TVA will revise the BFN GL 89-10 program to address the design input issues identified by NRC during IR 97-11 by January 31, 1998.

STATUS

TVA has reviewed the valve types for BFN and made a determination of the appropriate valve factors associated with each valve type. The basis for the valve factors includes the consideration of DP test data from BFN, Sequoyah Nuclear Plant, NRC/Idaho National Engineering Laboratory (INEL) valve testing, Electric Power Research Institute (EPRI) Performance Prediction Program testing, and other utilities as applicable to the BFN valves.

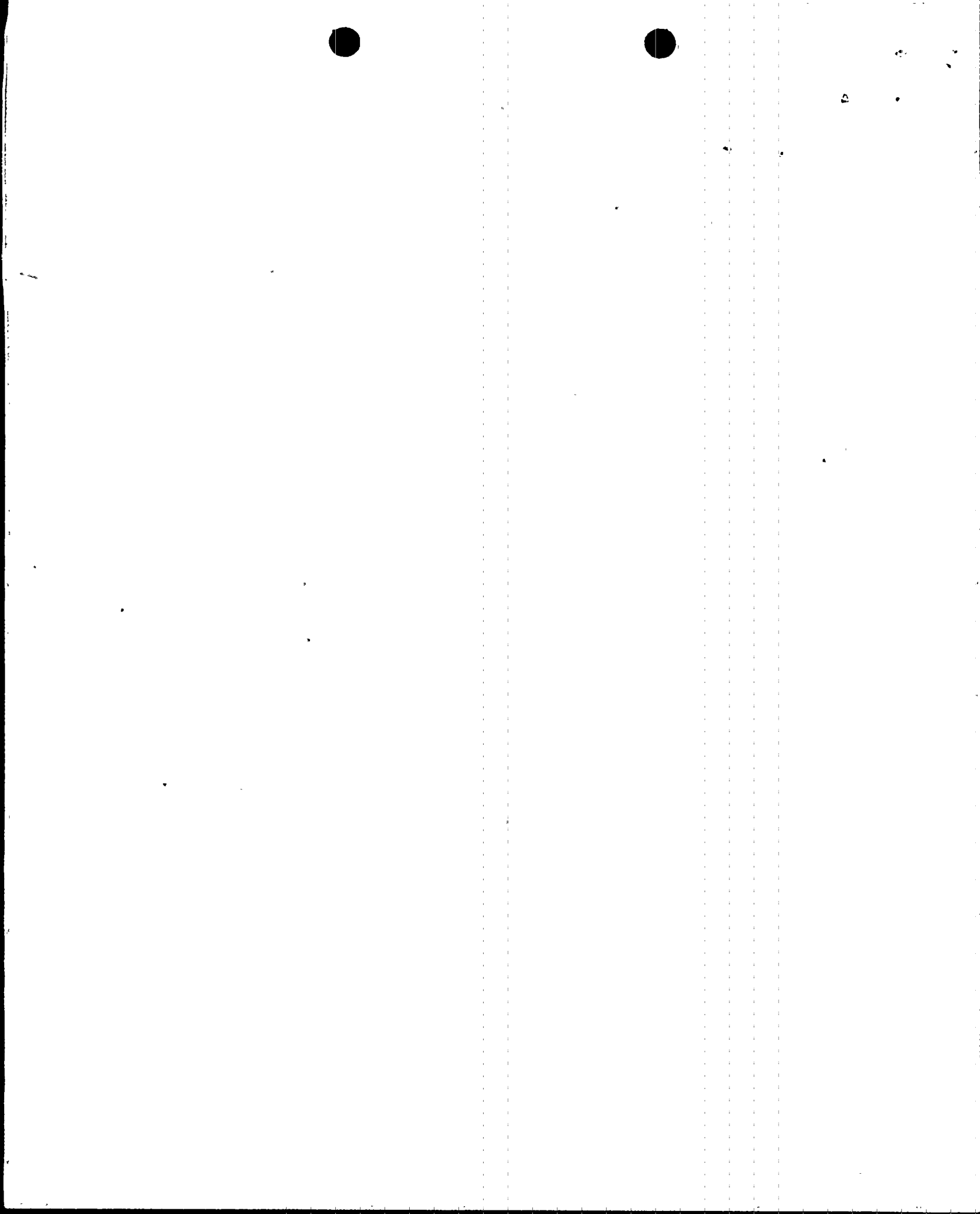
Parameters for valve factor, stem factor coefficient of friction, and Load Sensitive Behavior (Rate of Loading) and the technical basis for the values used for each of these parameters has been documented in TVA calculation MD-Q0999-980001. Where applicable, statistical analysis has been used to determine appropriate values for stem factor coefficient of friction, and Load Sensitive Behavior. TVA considers that the actions regarding this commitment are complete.

TVA COMMITMENT

TVA will revise the BFN Unit 3 Motor-Operated valve design calculations to reflect the GL 89-10 program design input revisions by March 31, 1998.

STATUS

TVA is in the process of incorporating the design parameters described above into the BFN Unit 3 MOV calculations. TVA is on track to complete the Unit 3 MOV design calculations by March 31, 1998. MOV modifications required as a result of the parameter changes are planned, subject to material availability, to be implemented during the next Unit 3 refueling outage (Fall 1998).



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TVA COMMITMENT

TVA will revise the BFN Unit 2 Motor-Operated valve design calculations to reflect the GL 89-10 program design input revisions by August 31, 1998.

STATUS

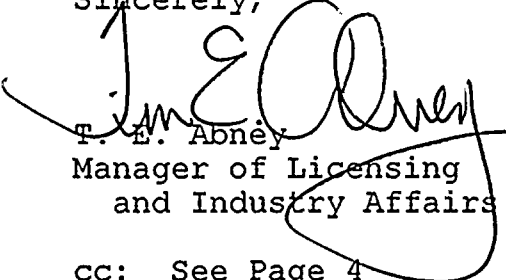
Based on the time required to complete the BFN Unit 3 MOV design calculations, and lessons learned during the process, TVA does not anticipate any problem in meeting its August 31, 1998, commitment for revising the BFN Unit 2 MOV design calculations. MOV modifications required as a result of the parameter changes are planned, subject to material availability, to be implemented during the next Unit 2 refueling outage (Spring 1999).

In summary, TVA is on schedule to meet the commitments in its December 15, 1997 letter regarding the issues identified by NRC during the BFN Unit 3 GL 89-10 closure inspection (IR 97-11).

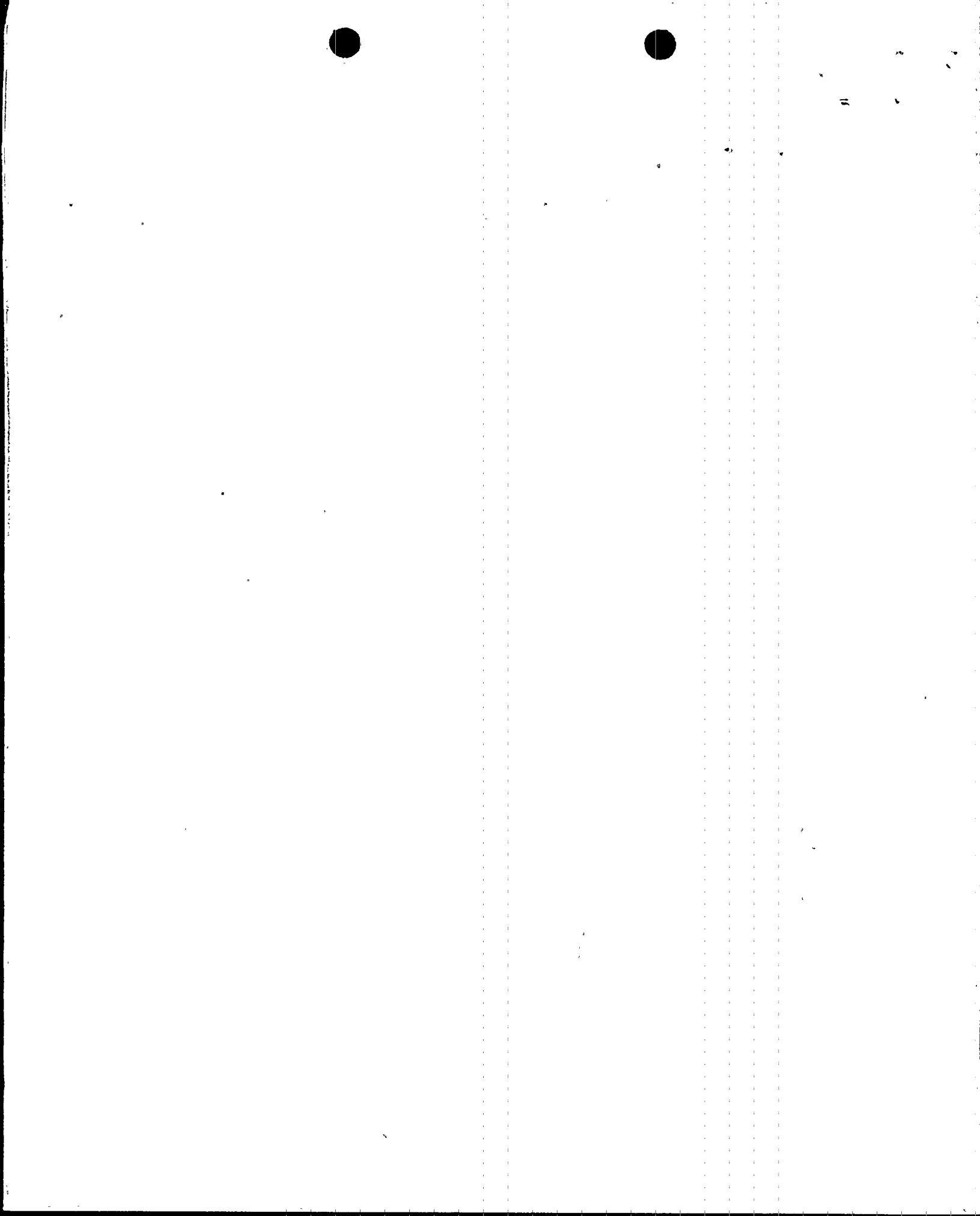
The due date for this letter was revised from March 2, 1998, to March 16, 1998, in accordance with TVA's commitment evaluation process. The revised date was discussed with E. H. Girard, NRC, Region II.

If you have any questions, please contact me at (205) 729-2636.

Sincerely,


T. E. Abney
Manager of Licensing
and Industry Affairs

cc: See Page 4



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